

REMARKS

In response to the above-identified Office Action, Applicant seeks reconsideration in view of the following remarks. Claims 19-28 remain pending. No new matter has been added.

I. Claim Rejections – 35 U.S.C. §103

Claims 19-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 5,898,679 (“Brederveld”) in view of U.S. Pat. No. 5,987,521 (“Arrowood”). This rejection is respectfully traversed.

Neither of the references, taken alone or in combination, disclose a wireless LAN providing functionality in accordance with a wireless communication standard protocol, wherein the wireless communication server “provides the functionality of the wireless communication standard protocol required for maintaining centralized filtering and forwarding of data to be transmitted to the remote units” as recited in claim 19.

The Examiner correctly notes that Brederveld fails to explicitly disclose a system wherein the centralized filtering and forwarding is at the server, but argues the Arrowood “teaches that a centralized filtering and forwarding data at the server would have minimized the complexity and cost,” and that it would have been obvious to “move the bridging function of the access point to the server.” Applicant respectfully disagrees.

Arrowood discloses a network system wherein *management* of routing information is centralized at a manager node, not a system where the actual routing of a wireless communication protocol is handled by that node. More particularly, Arrowood discloses “path tables” or “path status tables” 36 (see, e.g., Fig. 2) that keep track of all possible paths from and to a particular network node, and this table “is established in each Agent node of the network.” (Col. 2, lines 9-10). Each agent node then sends data packets “along the calculated route from the originating node to the destination node . . . by placing the route in the header of the data packet.” (Col. 4, lines 16-20). That is, in Arrowood, not only does each node have to deal with “filtering and forwarding” (in contrast to the centralized filtering and forwarding recited in the present claims), each node has the added complexity of storing *every possible path* from and to itself within the network. (Col. 5, lines 20-23).

Thus, if Brederveld were for some reason combined with Arrowood, the resulting system would be an unwieldy and complex network where each AP, server, and mobile unit includes a “path status table” and takes care of its own filtering and forwarding functions. This is dramatically different from the “reduction in complexity and cost” suggested by the Office Action.

Moreover, as with Arrowood, Brederveld also *teaches away* from the present invention. In an attempt to provide the selective repeater functionality, Brederveld notes that “one or more relays (or repeaters) may be incorporated into mobile stations, access points, or both.” (col. 4, lines 55-60). That is, not only is Brederveld making the system *more* complex by incorporating additional components and software within multiple mobile stations and/or access points, the reference at no time contemplates that the selectivity associated with the repeater functionality might be centralized at the server or elsewhere (e.g., server 105 in Fig. 1 of Brederveld). Brederveld sacrifices simplicity, cost, and centralization in the interest of improving communication, while the present invention centralizes the hitherto decentralized functionality of a communication standard in order to reduce cost and complexity. Thus, Brederveld would in no way motivate a person skilled in the art to move the filtering and forwarding requirements of an access point to a centralized server.

It bears repeating that traditional wireless communication standards such as the popular 802.11 series of standards had *exclusively* included access points with a specified set of functionality pertaining to filtering and forwarding of data. Due to the increasing need for applications that support a high volume of data between a large number of users simultaneously, the number of access points in a given traditional wireless network has increased significantly, leading to undesirable cost and complexity (see, e.g., Background, Par. [0001]-[0005]). Applicant therefore maintains that the Examiner’s conclusion with respect to the advantages of moving certain functionality to a centralized server is impermissible hindsight. MPEP 2145(X)(A). A person of ordinary skill in the art with the level of knowledge available at the time the invention was made would not have appreciated the benefits of moving a subset of the traditional access point functionality specified in a standard (e.g., the IEEE 802.11 specification) to a centralized server. The inventor was clearly proceeding contrary to accepted wisdom. MPEP 2145(X)(D)(3).

Accordingly, Applicants respectfully submit neither Brederveld nor Arrowood, taken alone or in combination, would include each and every element of claim 19 as currently pending, and

furthermore that there is no motivation to combine these references. As the remaining claims variously depend from claim 19, such claims are also non-obvious for at least the reasons set forth above. Applicants therefore request that the Section 103 rejections be withdrawn.

II. Conclusion

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or dpote@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,
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